

# **EXHIBIT 7**

Rothell Declaration

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**DR. RICHARD CARRIER,**

Plaintiff,

V.

**FREETHOUGHTBLOGS NETWORK,  
PAUL Z. MYERS, PH.D., THE ORBIT,  
STEPHANIE ZVAN, SKEPTICON, INC.,  
LAUREN LANE, and AMY FRANK-  
SKIBA,**

Defendants.

Case No. 2:16-cv-00906-MHW-EPD

Judge Michael H. Watson

## DECLARATION OF TREY A. ROTHELL

I, Trey A. Rothell, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I am employed as a paralegal for Randazza Legal Group, PLLC. I have first-hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

2. At all times relevant to this declaration, I accessed the Internet using an Apple MacBook Air laptop running the Mac OS Sierra operating system and Google Chrome web browser.

3. At all times relevant to this declaration, I accessed the Internet while physically located at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147.

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**Exhibit 1**

4. At approximately 11:17 AM Pacific Time on December 1, 2016, I accessed the URL <<http://www.richardcarrier.info/archives/7573>> through the web browser on my computer.

5. I observed an article entitled “How to Do Wrong Right,” which was attributed to Richard Carrier.

6. The date of the post was listed as June 5, 2015.

7. I printed a copy of the web page that I observed to a PDF.

8. A true and correct copy of the web page as I observed it on December 1, 2016 is attached to Defendant’s Motion to Dismiss as **Exhibit 1**.

**Exhibit A**

9. On December 1, 2016, I accessed the PACER docket for this case and downloaded a copy of Document Number 1-20 in this matter, which is Exhibit 20 to Plaintiff’s Complaint. I observed that the page appeared to be a printout of a Google Trends search result using the search term “richard carrier”, the location set as “United States”, the date range “7/12/16-8/12/16”, “All categories”, and the search type set as “Web Search”. The Subregion displayed appear to be Google Trends’ state-by-state breakdown.

10. I attempted to recreate the results by inputting the search parameters in ¶ 9 above into the Google Trends page on my computer.

11. Although I inputted exactly what I observed at Exhibit 20 to the Complaint into the Google Trends web page, I was unable to recreate what appears at Exhibit 20.

12. Rather than Ohio being the number one Subregion, I observed that Illinois was displayed as the number one Subregion for that time period.

13. I created a PDF image of the web page as I observed it by utilizing the Google Chrome extension “Awesome Screenshot,” which creates a true image capture of a web page while retaining the formatting of the web page’s visible elements.

14. A true and correct image of the web page as I observed it on December 1, 2016 is attached to this declaration as Exhibit A.

**Exhibit B**

15. In addition to viewing subregions in Google Trends by state, Google Trends allows users to view interest in the search term by metropolitan area.

16. On December 1, 2016, I ran a Google Trends search using the search term “richard carrier” between July 12, 2016 through August 12, 2016, and prompted the page to display interest by metropolitan area.

17. I created a PDF image of the web page as I observed it by utilizing the Google Chrome extension “Awesome Screenshot.”

18. A true and correct image of the web page as I observed it on December 1, 2016 is attached to this declaration as Exhibit B.

**Exhibit C**

19. On December 1, 2016, I ran a Google Trends search using the search term “richard carrier” over the past 5 years, and prompted the page to display interest by metropolitan area.

20. I observed that the top metropolitan area for the search term “was “Los Angeles CA”, the second most-interested region was “San Francisco-Oakland-San Jose CA”, and the third most-interested region was “New York NY”.

21. I created a PDF image of the web page as I observed it by utilizing the Google Chrome extension “Awesome Screenshot.”

22. A true and correct image of the web page as I observed it on December 1, 2016 is attached to this declaration as Exhibit C.

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**Exhibit D**

23. On December 1, 2016, I ran a Google Trends search using the search term “richard carrier” over the past 12 months, and prompted the page to display interest by metropolitan area.

24. I observed that the top most-interested metropolitan area for the search term was “San Francisco-Oakland-San Jose CA”, the second most-interested metro area was “New York NY”, and the third was “Los Angeles CA.”

25. I created a PDF image of the web page as I observed it by utilizing the Google Chrome extension “Awesome Screenshot.”

26. A true and correct image of the web page as I observed it on December 1, 2016 is attached to this declaration as Exhibit D.

**Exhibit E**

27. On December 1, 2016, I ran a Google Trends search using the search term “richard carrier” over between the dates July 30, 2015 to August 1, 2016, and prompted the page to display interest by metropolitan area.

28. I observed that the top most-interested metropolitan area for the search term was “San Francisco-Oakland-San Jose CA”, the second most-interested metro area was “New York NY”, and the third was “Los Angeles CA.”

29. I created a PDF image of the web page as I observed it by utilizing the Google Chrome extension “Awesome Screenshot.”

30. A true and correct image of the web page as I observed it on December 1, 2016 is attached to this declaration as Exhibit E.

**Exhibit F**

31. On December 1, 2016, I ran a Google Trends search using the search term “marc randazza” over between the dates July 12, 2016 to August 12, 2016, and prompted the page to display interest by state.

32. I observed that the top-most interested subregion for the search term was the State of California. I created a PDF image of the web page as I observed it by utilizing the Google Chrome extension “Awesome Screenshot.”

33. A true and correct image of the web page as I observed it on December 1, 2016 is attached to this declaration as Exhibit F.

### **Exhibit 8**

34. On December 1, 2016 at approximately 4:01 PM Pacific time, I accessed the URL <http://serpify.me/> using the web browser on my computer.

35. I observed a web page for the service Serpify, which allows its users to game search engines by using remotely controlled computers to search certain keywords on a designated search engine and access certain websites.

36. Serpify charges its users for this service.

37. I printed a copy of the web page that I observed to a PDF.

38. A true and correct copy of the web page as I observed it on December 1, 2016 is attached to Defendant’s Motion to Dismiss as Exhibit 8.

### **Exhibit 9**

39. On December 1, 2016 at approximately 4:02 PM Pacific time, I accessed the URL <https://userator.ru/> using the web browser on my computer.

40. I observed a web page for the service Userator, which allows its users to game search engines by using remotely controlled computers to search certain keywords on a designated search engine and access certain websites.

41. Userator charges its users for this service.

42. I printed a copy of the web page that I observed to a PDF.

43. A true and correct copy of the web page as I observed it on December 1, 2016 is attached to Defendant’s Motion to Dismiss as Exhibit 9.

**Exhibit 10**

44. On December 1, 2016 at approximately 1:54 PM Pacific time, I accessed the URL <<https://secularstudents.org/conference/past>> using the web browser on my computer.

45. I observed a web page entitled “Past Secular Student Alliance Conferences.”

46. I printed a copy of the web page that I observed to a PDF.

47. A true and correct copy of the web page as I observed it on December 1, 2016 is attached to Defendant’s Motion to Dismiss as **Exhibit 10**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 1, 2016.



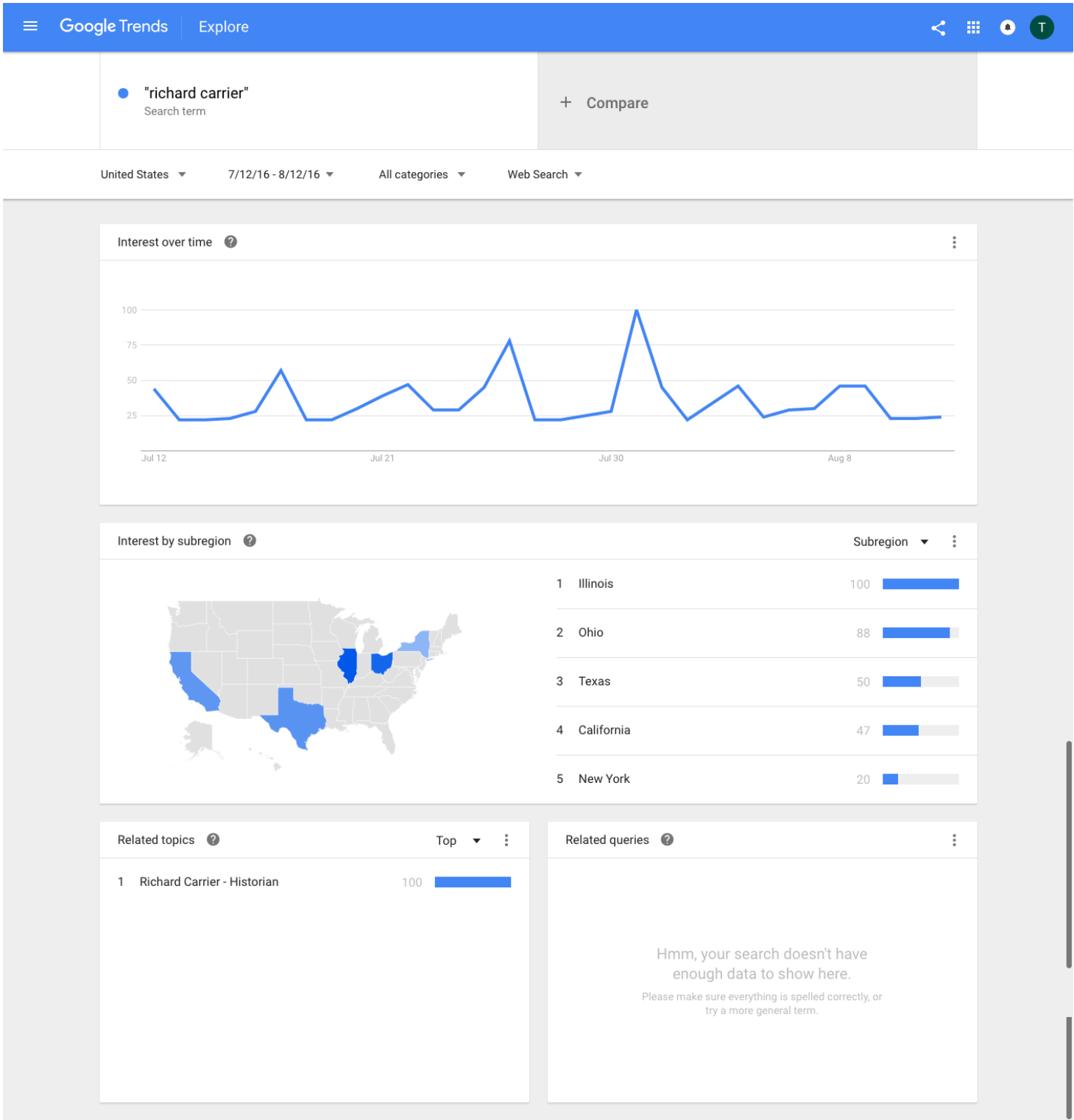
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Trey A. Rothell

# **EXHIBIT A**

Google Trends Results





**EXHIBIT B**

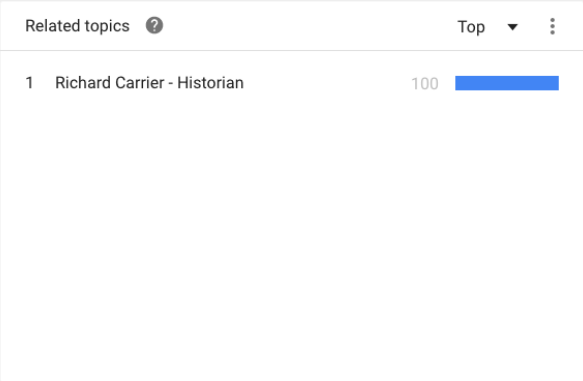
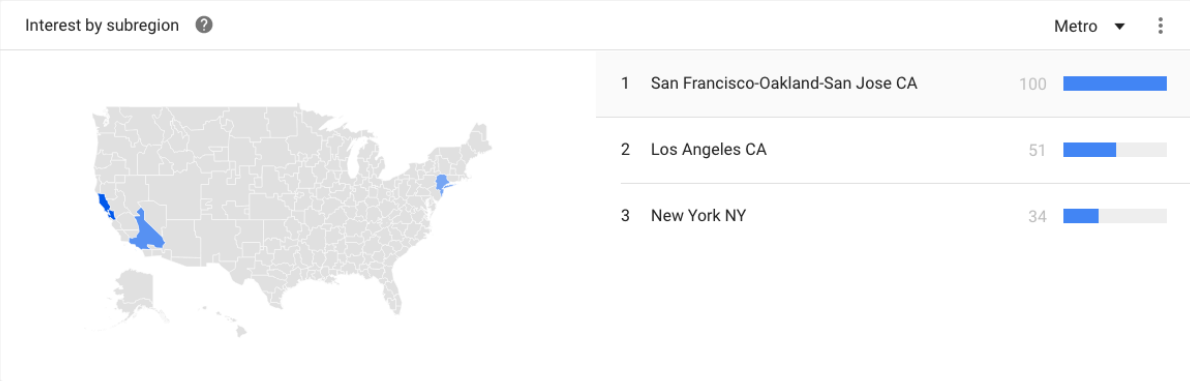
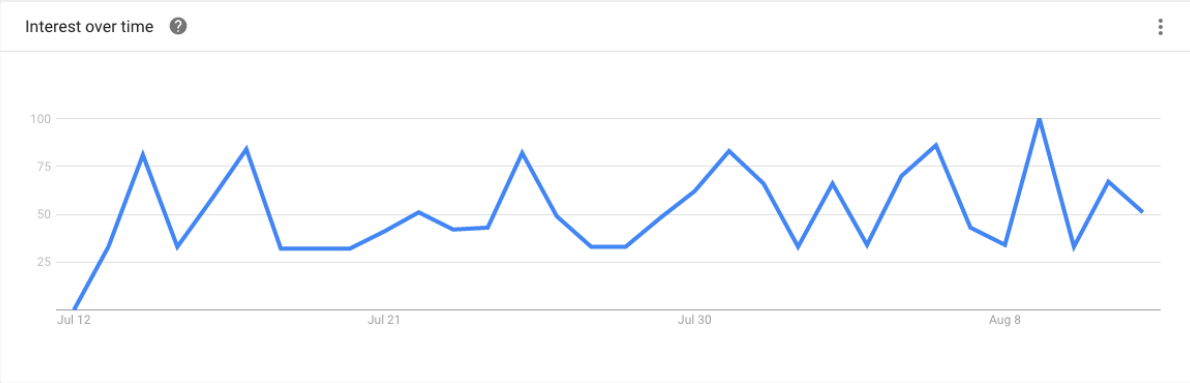
Google Trends Results

richard carrier

Search term

+ Compare

United States 7/12/16 - 8/12/16 All categories Web Search



Related queries

Hmm, your search doesn't have enough data to show here.

Please make sure everything is spelled correctly, or try a more general term.

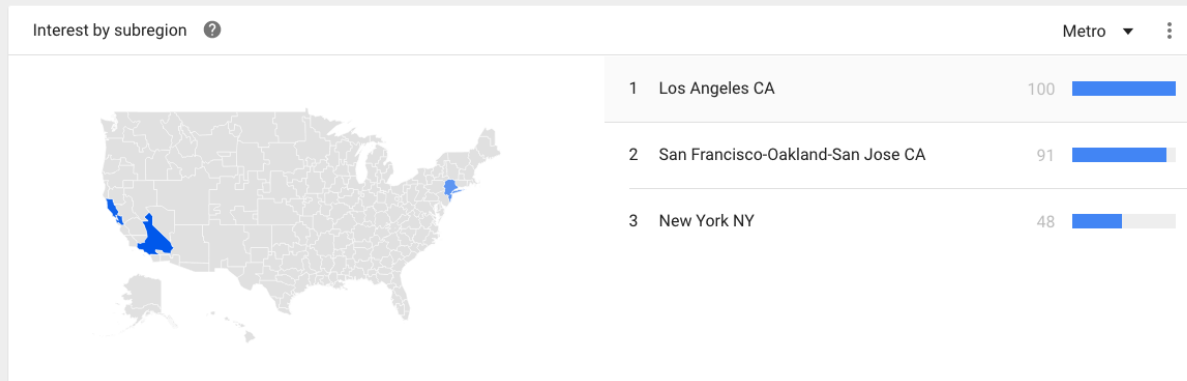
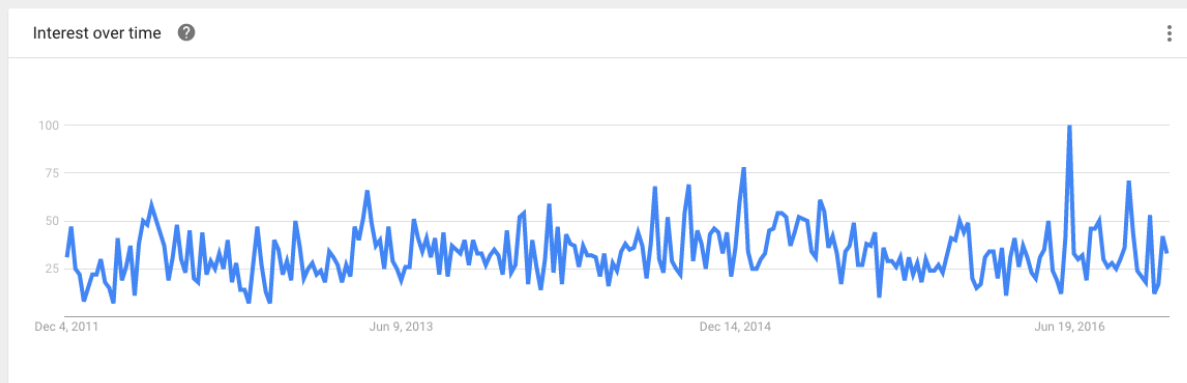
## **EXHIBIT C**



Google Trends Results




- "richard carrier"  
Search term

+ Compare

United States ▼ Past 5 years ▼ All categories ▼ Web Search ▼



Related topics 		Rising ▼ 
1	Historicity of Jesus - Topic	Breakout
2	Historical Jesus - Topic	Breakout
3	Josephus - Historian	Breakout
4	Argument - Topic	Breakout
5	Richard Carpenter - Musician	Breakout

Related queries 		Rising  
1	bart ehrman	+450%

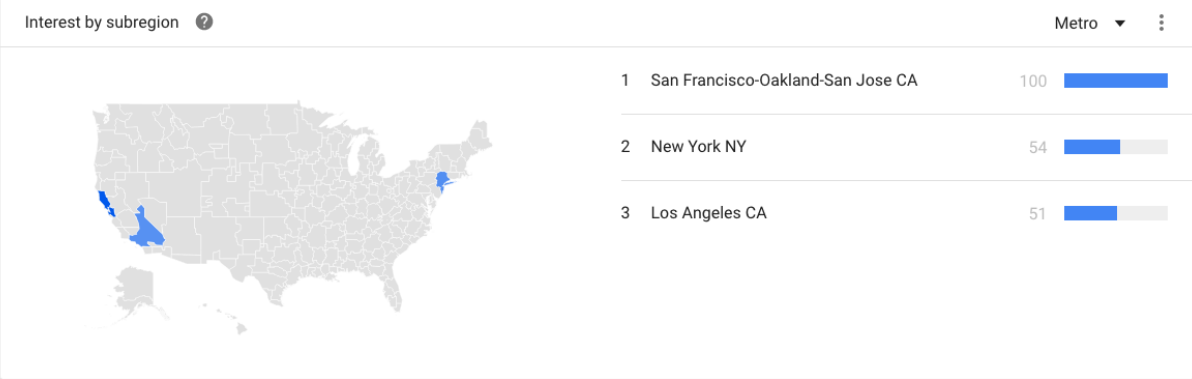
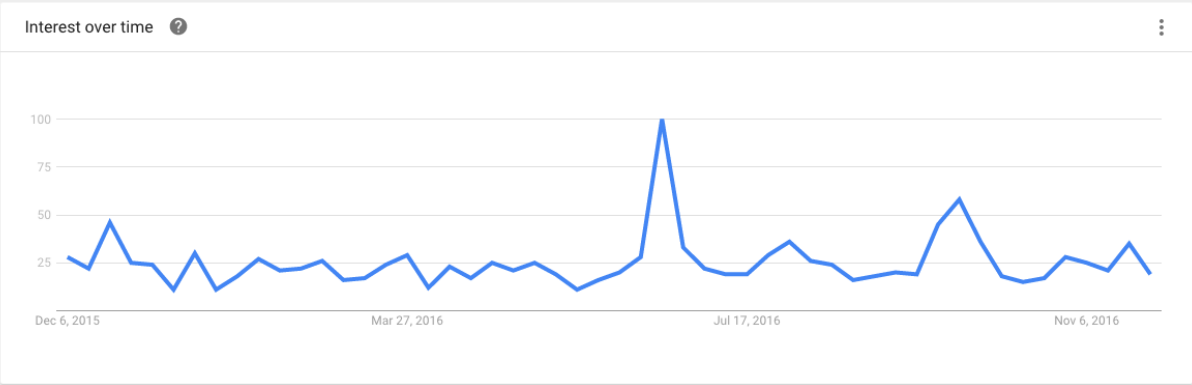
## **EXHIBIT D**

Google Trends Results

● "richard carrier"  
Search term

+ Compare

United States ▼ Past 12 months ▼ All categories ▼ Web Search ▼



Related topics ?

Rising ▼ ⋮

1	Historicity of Jesus - Topic	+80%
2	Blog - Website	+70%
3	Christ myth theory - Topic	+70%
4	Jesus - Preacher	+60%
5	Atheism - Topic	+60%

Related queries ?

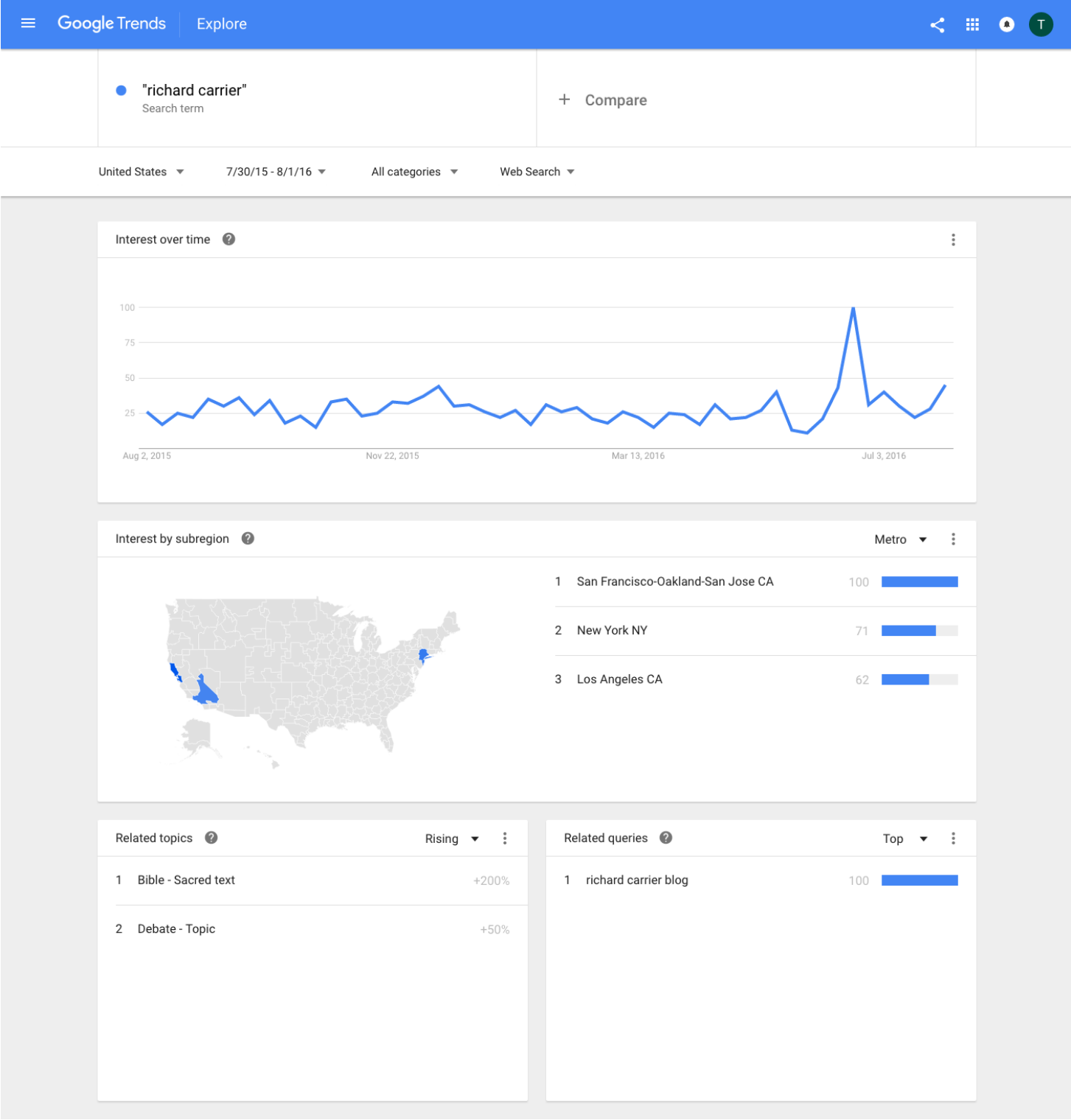
Top ▼ ⋮

1	richard carrier blog	100
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## **EXHIBIT E**

Google Trends Results





## **EXHIBIT F**

Google Trends Results

